

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ANDREA K. TANTAROS,

Plaintiff,

-against-

FOX NEWS NETWORK, LLC, FOX
CORPORATION, INC., ROGER AILES,
WILLIAM SHINE, JOHN FINLEY, SCOTT
BROWN, AND SUZANNE SCOTT,

Defendants.

Case No. 1:25-CV-01675(VSB)

**DECLARATION OF PAUL EVANS IN SUPPORT OF
MOTION TO DISMISS AMENDED COMPLAINT**

I, Paul Evans, declare as follows:

1. I am an attorney duly admitted to practice before this Court and the Courts of the State of New York. I am a partner with the law firm of Paul Hastings LLP and counsel of record for Defendants Fox News Network, LLC (“Fox News”), Fox Corporation, and Suzanne Scott (collectively, the “Fox Parties”). I make this declaration in support of the Fox Parties’ motion to dismiss the amended complaint of Plaintiff Andrea K. Tantaros. I have personal knowledge of the matters set forth in this Declaration and, if called as a witness, could and would testify competently thereto.

2. On August 22, 2016, Ms. Tantaros filed a complaint against the Fox Parties in the Supreme Court of New York for New York County, Index No. 157054/2016 (“*Tantaros I*”), alleging workplace sexual harassment and retaliation.

3. On August 29, 2016, the Fox Parties moved to compel Ms. Tantaros’ claims to arbitration based on the arbitration provision contained in the Employment Agreement executed

by Ms. Tantaros. A true and correct copy of the arbitration provision contained in the Employment Agreement is attached hereto as **Exhibit 1**.¹

4. Ms. Tantaros opposed the motion to compel, arguing that her arbitration agreement with Fox News, the operative arbitration agreement, was unenforceable. Among other reasons, she argued that Fox News had materially breached the agreement and that her claims were not subject to arbitration. Attached hereto as **Exhibit 2** is a true and correct copy of the Memorandum of Law in Opposition to Motion to Compel filed by Ms. Tantaros in that action.

5. The court, Hon. David B. Cohen presiding, granted the Fox Parties' motion and compelled Ms. Tantaros' claims to arbitration. Attached hereto as **Exhibit 3** is a true and correct copy of the notice of entry of the court's order, including the transcript of the hearing on the Fox Parties' motion.

6. Ms. Tantaros initially filed a Notice of Appeal ("Notice") of the court's order on March 24, 2017, but failed to pursue it. Attached hereto as **Exhibit 4** is a true and correct copy of the Notice, which attaches a copy of the court's order granting the Fox Parties' motion to compel.

7. Ms. Tantaros later filed her claims against the Fox Parties as counterclaims in an arbitration pending before the American Arbitration Association ("AAA") in New York. [REDACTED]

[REDACTED]

[REDACTED].

8. On April 24, 2017, while *Tantaros I* was pending, Petitioner filed another complaint before the Southern District of New York, No. 17-CV-2958 ("*Tantaros IP*"), in which she asserted electronic and physical surveillance claims against Fox News, among others.

¹ This provision was previously filed on the public docket in *Tantaros I* and *Tantaros III* (both defined below).

9. On July 17, 2019, Ms. Tantaros filed another petition against the Fox Parties in the Supreme Court of New York for New York County. The Fox Parties removed Ms. Tantaros' petition to federal court on July 30, 2019, and the matter was assigned to the Honorable Andrew L. Carter, Jr., *Tantaros v. Fox News Network, LLC, et al*, No. 1:19-cv-07131-ALC (S.D.N.Y. 2019) ("*Tantaros III*"). The arbitration pending before AAA was stayed during the pendency of that court matter. Following Judge Carter's decision dismissing *Tantaros III*, the stay in the arbitration was lifted.

10. [REDACTED]

11. [REDACTED]

12. [REDACTED]

13. [REDACTED]

14. [REDACTED]

[REDACTED].

15. On February 3, 2025, Ms. Tantaros filed another petition before the Southern District of New York, No. 1:25-CV-00961 (“*Tantaros IV*”), seeking “emergency” relief from the arbitration proceedings.


16. [REDACTED]

[REDACTED]
[REDACTED].

I declare under penalty of perjury under the laws of the United States of America and the State of New York that the foregoing is true and correct.

Executed on the 2nd day of September, 2025, in Philadelphia, PA.

Dated: September 2, 2025



Paul C. Evans